



SIERRA CLUB

October 7, 2020

Via electronic delivery

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges
Docket No. 2020-125-E
Sierra Club's Third Set of Data Requests

Dear Ms. Boyd,

On behalf of Robert Guild, please find enclosed for filing in the above-referenced case Sierra Club's third set of data requests. This request was filed today via the South Carolina Public Service Commission Case E-Filing System. As indicated on the Certificate of Service, I am serving all parties of record via electronic mail.

Please contact me with any questions.

Sincerely,



on behalf of

Robert Guild
S.C. Bar No. 2358
314 Pall Mall Street
Columbia, SC 29201
(803) 916-5738
bguild@mindspring.com

Enclosure

cc: Certificate of Service

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-125-E

In re:

Application of Dominion Energy South
Carolina, Incorporated for Adjustment
of Rates and Charges (See Commission
Order No.2020-313)

**SIERRA CLUB’S THIRD SET OF
DATA REQUESTS
October 7, 2020**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. (“Dominion” or the “Company”) in the above referenced docket. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

INSTRUCTIONS

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared

using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
 - (i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.

7. Due to the current COVID-19 situation and most people working remotely, please deliver all responses to the following interrogatories and requests for production of documents

electronically to:

Robert Guild
bguild@mindspring.com

Dorothy E. Jaffe
dori.jaffe@sierraclub.org

DEFINITIONS

1. The “Company” is defined to include both the Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets,

data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications, any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..

5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business affiliation if a natural person, and corporate or other status and address if not a natural person. “Identify” or “identity” when used in reference to a document means to state the following as to each document:
 - a. Its nature and contents;
 - b. Its date;
 - c. The date it was executed if different from the date it bears;
 - d. The name, address and position of its author or signer;
 - e. The name, address and position of its addressee, if any;
 - f. Its present location and the name, present address and position of the person or persons having present custody; and
 - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.

8. “You” or “your” means Dominion Energy South Carolina and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of Dominion Energy South Carolina.

DATA REQUESTS

Request No. 3-1. Please see the Company’s response to Sierra Club Request 1-28. If not already provided in response to Sierra Club 1-28, please provide the Excel revenue requirements model that is mentioned at the bottom of p.41 in the 2020 IRP.

Request No. 3-2. Reference page 6, paragraph 20 of the Application, “[s]ince the close of the prior test period, DESC has also invested approximately \$878 million in upgrades, improvements and additional environmental controls for its generation plants.” Please provide a summary, organized by electric generating unit, briefly describing how the \$878 million was spent on “additional environmental controls,” including the purpose, which state or federal environmental regulation required the investment, and capital and annual O&M costs of each investment.

Request No. 3-3. Reference the Company’s response to Sierra Club Set 1-19 where the Company states: “Williams and Wateree coal plants are in full compliance with new source review provisions, coal combustion residuals, effluent limitation guidelines, national ambient air quality standards, cooling water intake standards, the cross-state air pollution rule, the mercury and air toxics standards, regional haze, and carbon dioxide emissions.”

- a. Please reconcile the above statement with the Company’s response to Staff Set 2-26 in

Case No. 2019-226-E, *South Carolina Energy Freedom Act (House Bill 3659)*

Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Incorporated, where the Company stated:

“In resource plans RP1, RP2, RP4, RP5, RP6, RP7, it was assumed that capital dollars were spent at Wateree and Williams Stations to install ELG mitigation equipment in 2026. The estimations of capital costs were \$101.7M at Wateree Station for flue-gas desulfurization (FGD) wastewater treatment and \$126.8M at Williams Station for bottom ash transport water treatment and FGD wastewater treatment. In addition, it was assumed that fixed O&M increased \$3.33M/year at Wateree Station and \$4.16M/year at Williams Station beginning in 2026 because of the installed ELG mitigation equipment.

A copy of the Company’s response to Staff 2-26 is attached as Exhibit 1.

- b. Is the \$101.7 million at Wateree Station for flue-gas desulfurization (FGD) wastewater treatment and the \$126.8 million at Williams Station for bottom ash transport water treatment and FGD treatment no longer required to be done in 2026?
- c. Did the Company already invest the \$101.7 million at Wateree Station for FGD wastewater treatment and the \$126.8 million at Williams Station for bottom ash transport water treatment and FGD treatment before the anticipated 2026 date in the Company’s response to Staff 2-26?
- d. If the answer to (c) is yes, was the \$101.7 million at Wateree and \$126.8 million at Williams Station included in the \$878 million referenced on page 6, paragraph 20 of the application?

Respectfully submitted this 7th day of October, 2020.

 on behalf of

Robert Guild
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314 Pall Mall Street
Columbia, SC 29201
(803) 917-5738
bguild@mindspring.com

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-125-E**

In re:

Application of Dominion Energy South
Carolina, Incorporated for Adjustment
of Rates and Charges (See Commission
Order No.2020-313)

CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2020-125-E, listed below, a copy of the Sierra Club's Third Set of Data Requests via electronic mail on this day, October 7, 2020.

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On behalf
of Robert Guild

Exhibit 1

**DOMINION ENERGY SOUTH CAROLINA, INC.
OFFICE OF REGULATORY STAFF'S SECOND AND CONTINUING REQUEST
FOR PRODUCTION OF BOOKS, RECORDS, AND OTHER INFORMATION
DOCKET NO. 2019-226-E**

REQUEST NO. 2-26:

See the Company's response to ORS Request 1-17, which states, "In the 2019 proposed rulemaking, EPA proposed significant changes to the rule including new effluent limits and an incentive for early retirement of existing generating units. All eight Resource Plans were impacted by the early retirement of a unit prior to an ELG upgrade or the inclusion of an estimate for ELG costs."

- a) Provide further details about what was meant by "All eight Resource Plans were impacted by the early retirement of a unit prior to an ELG upgrade or the inclusion of an estimate for ELG costs." What early retirement prior to an ELG upgrade occurred and what modeling assumptions were made? If the assumptions differed in the 8 different resource cases, please provide the different assumptions.
- b) What ELG upgrades were assumed and what modeling assumptions were made? If the assumptions differed in the 8 different resource cases, please provide the different assumptions.
- c) In the 8 resource plans modeled. Please identify all PROSYM modeling inputs that were different in the 8 cases associated with environmental modeling assumptions. Provide any workpapers that were used to derive the assumptions.
- d) If all of the environmental modeling assumptions were the same in all 8 cases, how can that study design allow for a reasonable comparison of the cases? In other words, in cases in which coal units retire early, those cases would avoid having to incur environmental upgrade costs, whereas the cases without retirement would incur additional environmental costs such as required by the ELG rule.

RESPONSE NO. 2-26:

- a),b),c) In resource plans RP1, RP2, RP4, RP5, RP6, RP7, it was assumed that capital dollars were spent at Wateree and Williams Stations to install ELG mitigation equipment in 2026. The estimations of capital costs were \$101.7M at Wateree Station for flue-gas desulfurization (FGD) wastewater treatment and \$126.8M at Williams Station for bottom ash transport water treatment and FGD wastewater treatment. In addition, it was assumed that fixed O&M increased \$3.33M/year at Wateree Station and \$4.16M/year at Williams Station beginning in 2026 because of the installed ELG mitigation equipment.

In resource plan RP3 Wateree Station is retired in 2028 and no ELG costs are required at Wateree Station. It was assumed that capital dollars were spent at Williams Stations to install ELG mitigation

**DOMINION ENERGY SOUTH CAROLINA, INC.
OFFICE OF REGULATORY STAFF'S SECOND AND CONTINUING REQUEST
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DOCKET NO. 2019-226-E**

equipment in 2026. The estimations of capital costs were \$126.8M at Williams Station for bottom ash transport water treatment and FGD wastewater treatment. In addition, it was assumed that fixed O&M increased \$4.16M/year at Williams Station beginning in 2026 because of the installed ELG mitigation equipment.

In resource plan RP8 Wateree Station and Williams Station are retired in 2028, and no ELG costs are required at either station.

- c) Work papers for the costs used were provided in Response 1-17 as attachment "Confidential Attachment to Response 1-17.pdf."
- d) The environmental modeling assumptions are not the same for each of the 8 resource plans but they are the same for each of the 8 cases, which evaluate sensitivities within a resource plan.

PERSON RESPONSIBLE: James Neely